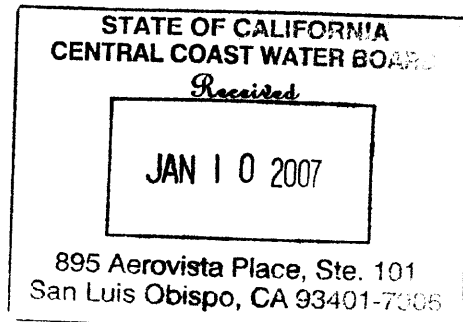




CITY OF EL PASO DE ROBLES

"The Pass of the Oaks"



January 8, 2007

California Regional Water Quality Control Board
Attn: Roger W. Briggs, Executive Officer
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Subject: Response to Letter dated December 12, 2006
City of Paso Robles,
WDID # 3 40MS03019

Dear Mr. Briggs:

As requested, the City is responding to your letter dated December 12, 2006 which enumerated 14 items that needed to be addressed. Our response to each item is as follows.

1. The City is committed to implementing all Year 2 BMPs as outlined in the City's approved SWMP. Further, the City will continue with those tasks that are on-going in Year 1 implementation
2. The City's Adopt-a-Street brochure and fact sheet are complete (see attached). These will be distributed in the next few months. We will provide results of the program in our Annual Report in September 2007.
3. The City will perform a survey of its Adopt-a-Street program. We will issue a survey *before* distribution of the brochure and fact sheet. We will then distribute the fact sheet and schedule a workshop to educate participants. After the workshop, we will perform another survey to provide us information on whether the participants gained knowledge about storm water quality.
4. The City will complete Year 2 implementation for those listed in Table 4-1 of the approved SWMP.
5. The City will develop storm water materials and displays that will be distributed and shown at events during Year 2 implementation.
6. The City will attend four events to distribute storm water materials in Year 2. These are:

Mid State Fair	July/August 2007
Pioneer Day	October 2007
Grand Opening of the Salinas River	March 2007
Earth Day events	Spring 2007

As reported in our Annual Report, the City did not participate in Mid-State Fair and Pioneer Day 2006. Instead, City staff participated in regional events at Kids Day in downtown San Luis Obispo and the Teachers Fair at the Veterans Hall in San Luis Obispo. We felt that for this first year effort, we wanted to attend events that were specific to address storm water quality targeted to a specific audience (students and teachers) rather than more general events. We also wanted to network with the other cities in order to gain experience in performing these tasks. The end result is still the same, we informed the public and therefore we feel that we met the intent of the SWMP.

We will be providing the dates of the events we will be attending for Year 2 and also provide the number of printed materials distributed when we submit our Annual Report in September 2007.

7. PP-2A requires the City to prepare a "stock presentation" to inform the community about the need and benefits for the storm water program and SWMP during Year 2 implementation. PP-2B requires that the stock presentation be modified and presented four times in Year 2. We are asking that this BMP be modified to prepare the stock presentation and present it to the public at two meetings. We simply will not have adequate time to make four presentations *and* prepare the stock presentation in one year. If needed, we can make six presentations in Year 3 so there will be a total of 16 presentations throughout the life of the permit.
8. As reported in our Annual Report, the City will adopt an ordinance to incorporate General Permit Attachment 4 requirements to its Municipal Code by June 30, 2007.
9. In ID-4A, the City has selected four outfalls that will be inspected and monitored. These are outfalls at the downstream end of major watersheds. The City has a total of 55 outfalls. In ID-4B, the City will inspect and monitor 30 major outfalls in Year 2 and the remaining 25, that are considered to be minor in function, in Year 3.
10. The City will provide details of its inspection procedures and will report on our progress in September 2007. In Year 3, an ordinance will be developed along with standards, details and procedures to address illicit discharge.
11. The City will develop and implement an effective BMP tracking system which we will provide in our Annual Report in September 2007.
12. We feel that a public survey is an inadequate method to determine and assess public education and outreach in Year 2. Therefore, this BMP will be eliminated at this time. In lieu of a survey for Year 2, we will focus our efforts in those individuals who are part of the Adopt-a-Street program. Our plan is to provide education materials to them regarding storm water quality. We will then survey them to determine if the materials provided were effective. (See item 3 above.)
13. The City currently does not have an Integrated Pest Management/Nutrient Management program (IPM/NM). As you pointed out BMP GH-1F mentions this IPM/NM and mentions only monthly documentation of chemical usage in the "Frequency and Progress Measurement" section. We would like to suggest that we will research and educate our Parks lead work regarding IPM/NM and compile a list the current chemical usage for our year 3 BMP GH-1F goal. Then in subsequent years we will set goals to decrease chemical usage and increase other methods of pest control as is the goal of a IPM/NM program.

14. We would like to offer the following clarification of BMP GH-1I states as the measurable goal the installation and maintenance of filters on 10 drain inlets. We intend to investigate various types of drain inlet filtration devices, identify 10 of our most problematic drain inlets (lots of nuisance water and/or potential pollutants) and use one or more of these devices on each. Then we will measure the debris or other substance that is collected. After the first year (Year 4 of plan) we will have an idea about which device works best or which devices work best for particular locations. Then, if warranted or within our ability (funds & manpower) to do so we will look at adding other drain inlets.

You also mentioned the "filter storm water runoff from roof drains" in your inquiry. This was mentioned in the original report but was not offered as a BMP. With your approval we would suggest that we add this task to BMP GH-1I. We intend to inventory our major city facilities and locate roof drains that could be diverted to landscaped area (preferably turf) to allow the water to soak into the soil as much as possible before it runs on to a hard surface and into the storm drain system. Again with your approval this would be incorporated into BMP GH-1I for Year 4.

Lastly, you mentioned our suggestion to institute better enforcement Vehicle hauling regulations. Again this was not addressed in a BMP therefore we would like to combine this in BMP GH-1I. The program will consist of a monthly unannounced surprise inspection of a loaded City dump truck to check for proper coverage of the load. Effectiveness will be measured by percentage of compliance. As is the case with the other two tasks in BMP GH-1I the inspections will happen in year 4 of the plan.

We hope the information included with this letter addresses the issues raised in your correspondence dated December 12, 2006. Should you have any questions or comments, please contact me at (805) 237-3861.

Sincerely,


Ditas Esperanza, P.E.
Capital Projects Engineer

cc: Doug Monn, Public Works Director
Brad Hagemann, Water Resources Manager
John Falkenstien, City Engineer
Dennis Fansler, Maintenance Services Superintendent